

Mark C. Mao, CA Bar No. 236165
 Beko Reblitz-Richardson, CA Bar No. 238027
BOIES SCHILLER FLEXNER LLP
 44 Montgomery St., 41st Floor
 San Francisco, CA 94104
 Tel.: (415) 293-6800
 mmao@bsflp.com
 brichardson@bsflp.com

Jesse Panuccio (admitted *pro hac vice*)
BOIES SCHILLER FLEXNER LLP
 1401 New York Ave, NW
 Washington, DC 20005
 Tel.: (202) 237-2727
 Fax: (202) 237-6131
 jpanuccio@bsflp.com

Amanda K. Bonn, CA Bar No. 270891
SUSMAN GODFREY L.L.P.
 1900 Avenue of the Stars, Suite 1400
 Los Angeles, CA 90067
 Tel: (310) 789-3100
 Fax: (310) 789-3150
 abonnn@susmangodfrey.com

Attorneys for Plaintiffs

Bill Carmody (admitted *pro hac vice*)
 Shawn J. Rabin (admitted *pro hac vice*)
 Steven M. Shepard (admitted *pro hac vice*)
 Alexander P. Frawley
 (admitted *pro hac vice*)
SUSMAN GODFREY L.L.P.
 1301 Avenue of the Americas,
 32nd Floor
 New York, NY 10019
 Tel.: (212) 336-8330
 bcarmody@susmangodfrey.com
 srabin@susmangodfrey.com
 ssh Shepard@susmangodfrey.com
 afrawley@susmangodfrey.com

John A. Yanchunis (admitted *pro hac vice*)
 Ryan J. McGee (admitted *pro hac vice*)
 Michael F. Ram (admitted *pro hac vice*)
 Ra O. Amen (admitted *pro hac vice*)
MORGAN & MORGAN
 201 N. Franklin Street, 7th Floor
 Tampa, FL 33602
 Tel.: (813) 223-5505
 jyanchunis@forthepeople.com
 rmcgee@forthepeople.com
 mram@forthepeople.com
 ramen@forthepeople.com

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA
 MUNIZ, ELIZA CAMBAY, SAL
 CATALDO, EMIR GOENAGA, JULIAN
 SANTIAGO, HAROLD NYANJOM,
 KELLIE NYANJOM, and SUSAN LYNN
 HARVEY, individually and on behalf of all
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**[PROPOSED] ORDER APPOINTING
 SPECIAL MASTER**

The Honorable Alex G. Tse
 Courtroom A – 15th Floor
 Trial Date: Not Yet Set

[PROPOSED] ORDER

Before the Court is the parties' joint letter brief regarding Plaintiffs' request for the Court to appoint a technical special master to resolve the parties' disputes over the scope and process for Google's production of data to the Plaintiffs, and to oversee that production process (*see, e.g.*, Dkts. 250, 253 (letter briefs regarding these disputes) ("Plaintiffs' Motion").

Plaintiffs' Motion is granted. The Court will appoint a Special Master for these purposes.

The parties must meet-and-confer to determine whether they can agree on a particular candidate. If the parties are unable to agree, they shall file a joint letter brief addressing their respective nominations consistent with this Court's Standing Order, which is due two weeks from the date of this Order. If the parties can agree on a candidate, they shall inform the Court of that agreement.

Once a special master is selected, whether by court order or agreement, the Parties and the special master shall together craft and submit to the Court a proposed order outlining the scope of the special master's responsibilities, and a plan for completing Google's data production.

IT IS SO ORDERED.

DATED: _____

Honorable Alex G. Tse
United States Magistrate Judge